

JS

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO. 21- 22**
v. : **DATE FILED:** 1/28/21
LEO KEIL : **VIOLATIONS:**
: **18 U.S.C. § 2252(a)(1), (b)(1) (transportation of**
: **child pornography - 1 count)**
: **18 U.S.C. § 2252(a)(2), (b)(1) (distribution and**
: **attempted distribution of child pornography –**
: **12 counts)**
: **Notice of Forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about February 17, 2018, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

LEO KEIL

knowingly transported and shipped a visual depiction using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer and mails, the producing of which involved the use of a minor engaged in sexually explicit conduct, and the visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(1), (b)(1).

COUNTS TWO THROUGH THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates shown below, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

LEO KEIL

knowingly distributed and attempted to distribute, to the persons using the usernames shown below, visual depictions, using any means and facility of interstate and foreign commerce, and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the producing of which involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct, each date constituting a separate offense:

Count	Date	Username
2	7/2/17	Jackie-b
3	7/6/17	Pumpkin-12
4	2/18/18	Susan
5	10/14/18	YngMomma
6	10/30/18	YngMomma
7	11/4/18	YngMomma
8	11/26/18	YngMomma
9	12/9/18	YngMomma
10	8/18/19	Sandie
11	10/12/19	StrokeNchat
12	10/15/19	CuriousM62
13	11/24/19	Brnda33

In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 2252, set forth in this indictment, defendant

LEO KEIL

shall forfeit to the United States of America any visual depiction described in Section 2252 and any matter containing such depictions, and any property used or intended to be used to commit or promote the commission of the offense, including, but not limited to: One HP desktop computer, Model P7-1010, bearing serial number MXU12903JZ.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without

difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL


GRAND JURY FOREPERSON

Jennifer L. Aribittier Williams
JENNIFER ARBITTIER WILLIAMS
Acting United States Attorney

JS

21-22

No. -----

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

LEO KEIL

INDICTMENT

Counts

18 U.S.C. § 2252(a)(2)(transportation of child pornography - 1 count)
18 U.S.C. § 2252(a)(2)(distribution of child pornography - 12 counts)

Notice of Forfeiture



Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____